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*Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Dennis Lloyd Hallman, Brandon Vera, Pablo
Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and
Daren Uyenoyama*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No. 5:14-cv-05484-EJD
5:14-cv-05591-EJD
5:14-cv-05621-EJD
5:15-cv-00521-EJD
5:15-cv-01324-EJD

**DECLARATION OF JOSEPH R. SAVERI IN
SUPPORT OF PLAINTIFFS' REQUEST FOR
JUDICIAL NOTICE SUPPORTING THEIR
OPPOSITION TO THE UFC's MOTION TO
DISMISS**

5:14-cv-05484-EJD, 5:14-cv-05591-EJD
5:14-cv-05621-EJD, 5:15-cv-00521-EJD
5:15-cv-01324-EJD

DECLARATION OF JOSEPH R. SAVERI

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Gabe Ruediger and Mac Danzig, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Kyle Kingsbury and Darren Uyenoyama, on
behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

I, Joseph R. Saveri, declare:

I am the Founding Partner of the Joseph Saveri Law Firm, Inc. ("JSLF"). I am an attorney of record in these related matters for Plaintiffs Le, Quarry, Fitch, Vazquez, Hallman, Vera, Garza, Ruediger, Danzig, Kingsbury and Uyenoyama, and a member in good standing with the State Bar of California. I submit this Declaration in support of Plaintiffs' Request for Judicial Notice in support of the Opposition to the Motion to Dismiss filed by Defendant Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC ("UFC"). I am a member of the California Bar in good standing and am admitted to practice before this Court. I have personal knowledge of the matters stated herein, and if called to testify I could and

1 would do so competently.

2 1. Attached hereto as Exhibit 1 is a true and correct copy of The UFC Official Website
3 “Discover The UFC” webpage, downloaded at my direction and available at
4 <http://www.ufc.com/discover/ufc/index>, last visited March 30, 2015.

5 2. Attached hereto as Exhibit 2 is a true and correct copy of The UFC Official Website
6 “Discover The Fighter” webpage, downloaded at my direction and available at
7 <http://www.ufc.com/discover/fighter/what-it-takes>, last visited March 30, 2015.

8 3. Attached hereto as Exhibit 3 is a true and correct copy of The UFC Official Website
9 “Discover The Sport” webpage, downloaded at my direction and available at
10 <http://www.ufc.com/discover/sport/index>, last visited March 30, 2015.

11 4. Attached hereto as Exhibit 4 is a true and correct copy of UFC.com webpage containing a
12 video entitled “UFC fighters train like elite warriors – Part 1,” downloaded at my direction and available
13 at <http://www.ufc.com/media/marines-ufc-fighters>, last visited March 30, 2015.

14 5. Attached hereto as Exhibit 5 are pertinent portions of a true and correct copy of a
15 Promotional webpage for UFC Fan Expo 2015, downloaded at my direction and available at
16 <http://www.ufcfanexpo.com/Overview/>, last visited March 30, 2015.

17 6. Attached hereto as Exhibit 6 is a true and correct copy of “About the UFC” webpage,
18 from the UFC-Forums.blogspot.com website, downloaded at my direction and available at [http://ufc-](http://ufc-forums.blogspot.com/2007_06_01_archive.html)
19 [forums.blogspot.com/2007_06_01_archive.html](http://ufc-forums.blogspot.com/2007_06_01_archive.html), last visited March 30, 2015.

20 7. Attached hereto as Exhibit 7 are pertinent portions of a true and correct copy of a media
21 kit for UFC 360 The Magazine, downloaded at my direction and available at
22 http://justmediakits.com/mediakit/263-ufc_360.html, last visited March 31, 2015.

23 8. Attached hereto as Exhibit 8 are pertinent portions of a true and correct copy of a UFC
24 Facebook Job Advertisement entitled *#Hiring: @UFC – Marketing Manager – Ultimate Fighting*
25 *Championship – Las Vegas, NV* and dated January 27, 2013. It was downloaded at my direction and is
26 available at [https://www.facebook.com/ FIGHTJOBS/posts/532978550067195](https://www.facebook.com/FIGHTJOBS/posts/532978550067195), last visited March 31,
27 2015

28 9. Attached hereto as Exhibit 9 is a true and correct copy of the LinkedIn page of Susie

1 Fotheringham, Former Payroll and Benefits Administrator, UFC, downloaded at my direction and
2 available at: <https://www.linkedin.com/in/susiefotheringham>, last visited March 31, 2015.

3 10. Attached hereto as Exhibit 10 are pertinent portions of a true and correct copy of an article
4 entitled *One-on-one with UFC President Dana White*, by Pramit Mohapatra, in the January 22, 2007
5 edition of The Baltimore Sun, downloaded at my direction and available at
6 <http://www.baltimoresun.com/sports/bal-whiteqa122-story.html#page=1>, last visited on March 30, 2015.

7 11. Attached hereto as Exhibit 11 is a true and correct copy of an article entitled *Fedor*
8 *Emelianenko cut by Zuffa LLC*, downloaded at my direction and available at
9 http://espn.go.com/mma/story/_/id/6833956/fedor-emelianenko-cut-zuffa-llc, last visited March 31,
10 2015.

11 12. Attached hereto as Exhibit 12 are pertinent portions of a true and correct copy of a Credit
12 Opinion of Zuffa, LLC, prepared in 2015 by Moody's Investors Service, downloaded at my direction and
13 available (for a fee) at <https://www.moodys.com/credit-ratings/Zuffa-LLC-credit-rating-820241467>.

14 13. Attached hereto as Exhibit 13 is a true and correct copy of an EA Sports press release
15 entitled *EA SPORTS to Produce UFC Videogames Under Licensing Agreement With Zuffa, LLC*, downloaded
16 at my direction and available at <http://investor.ea.com/releasedetail.cfm?ReleaseID=679827>, last visited
17 march 31, 2015.

18 14. Attached hereto as Exhibit 14 are pertinent portions of a true and correct copy of an article
19 entitled *MGM Resorts International's M life Teams Up with Ultimate Fighting Championship® for Knockout*
20 *Partnership*, downloaded at my direction and available at [http://newsroom.mgmresorts.com/mgm-](http://newsroom.mgmresorts.com/mgm-resorts/latest-news/mgm-resorts-internationals-m-life-teams-up-with-ultimate-fighting-championship-for-knockout-partnership.htm)
21 [resorts/latest-news/mgm-resorts-internationals-m-life-teams-up-with-ultimate-fighting-championship-](http://newsroom.mgmresorts.com/mgm-resorts/latest-news/mgm-resorts-internationals-m-life-teams-up-with-ultimate-fighting-championship-for-knockout-partnership.htm)
22 [for-knockout-partnership.htm](http://newsroom.mgmresorts.com/mgm-resorts/latest-news/mgm-resorts-internationals-m-life-teams-up-with-ultimate-fighting-championship-for-knockout-partnership.htm), last visited March 31, 2015.

23 15. Attached hereto as Exhibit 15 are pertinent portions of a true and correct copy of an article
24 entitled *In the Cage: MMA Fighters' Experience of Competition*, written by Peter Jensen, Jorge Roman,
25 Barrett Shaft, and Craig Wrisberg, included in the March 2013 edition of The Sports Psychologist,
26 downloaded at my direction and available at [http://journals.humankinetics.com/tsp-back-issues/tsp-](http://journals.humankinetics.com/tsp-back-issues/tsp-volume-27-issue-1-march/in-the-cage-mma-fighters-experience-of-competition)
27 [volume-27-issue-1-march/in-the-cage-mma-fighters-experience-of-competition](http://journals.humankinetics.com/tsp-back-issues/tsp-volume-27-issue-1-march/in-the-cage-mma-fighters-experience-of-competition), last visited April 9, 2015.

28 I declare under penalty of perjury under the laws of the United States and the State of California

1 that the foregoing is true and correct to the best of my knowledge and that this declaration was executed
2 in San Francisco, California on April 10, 2015.

3
4 /s/ Joseph R. Saveri

Joseph R. Saveri